



department of water, air and waste management

*Dennis  
File*

July 30, 1984

Clifton Precision

Attention: Mr. Paul Bohnsack, Mgr. Safety & Security  
2734 Hickory Grove Rd.  
Davenport, IA 52808

Re: RCRA Hazardous Waste Inspection

Dear Mr. Bohnsack:

Enclosed is a hazardous waste inspection report of your facility. We believe you will find the report self-explanatory and concur with report recommendations.

Please note: weekly inspections of container storage areas must be conducted and documented.

Also, please review and correct other deficiencies noted during this inspection.

This report will be forwarded to our Hazardous Waste Section for additional comment.

Should you have any questions or would like to discuss this report further, feel free to contact our office.

Sincerely,

FIELD SERVICES DIVISION

Merritt W. Van Lier  
Regional Administrator  
Regional Office #6

MWV:aw

Enc.

xc: ✓ Rod Vlieger, Central Office  
Donald Sandifer, P.E., EPA, Kansas City, MO  
File



R00337091  
RCRA RECORDS CENTER

RECEIVED

84 AUG 1 AM 11 42

HAZARDOUS WASTE  
MANAGEMENT  
DIVISION

# IOWA DEPARTMENT OF WATER, AIR AND WASTE MANAGEMENT

## Report Of Investigation

Page 1 Of 5

<b>INVESTIGATION DATE</b> Current <u>7/11/84</u>   Last <u>7/13/83</u>	<b>FROM:</b> (Use Stamp) <u>Region No. 6</u> <u>P. O. Box 27</u> <u>Washington, Iowa 52353</u>
<b>TO: (Facility Name, Location &amp; Address)</b>  <u>Clifton Precision</u> <u>2734 Hickory Grove Rd.</u> <u>Davenport, IA 52808</u>	<b>Persons Contacted (Name &amp; Position)</b> <u>Paul Bohnsack, Manager of Safety &amp; Security</u>
<b>RE: (Specify Investigation Purpose Or Cite Rule)</b>  <u>Hazardous Waste Inspection</u> <u>IAD005268420</u>	

### OBSERVATIONS/RECOMMENDATIONS

Clifton Precision, Instruments and Life Support Division, manufactures aircraft instrumentation, breathing oxygen regulators and oxygen generating equipment. This facility also has a bottle cleaning and charging station for small high pressure tanks used by the military in infrared night scopes.

Unit processes used by Clifton Precision are: electroplating, anodizing painting, aluminum conversion, heat treating, general manufacturing and assembly.

The hazardous wastes generated and stored on-site at Clifton Precision are primarily from metal parts degreasing, cleaning, heat treating and electroplating. The wastes generated include: (1) trichloroethylene, EPA no. F001; (2) spent pickling acids, EPA no. F009; (3) spent plating baths, EPA no. F007; (4) plating tanks sludges, EPA no. F008; (5) 1,1,1 trichloroethane, EPA no. F001; (6) sodium nitrite and sodium nitrate, EPA no. F011; (7) non-halogenated solvents including isopropyl alcohol, toluene, "Stoddard" solvent, lacquer thinner and methyl alcohol, EPA no. F005; and (8) non-halogenated solvents including acetone, cyclohexane and xylene, EPA no. F003.

This facility currently has interim status to store hazardous waste over 90 days. A Part B application was submitted by this facility for a permit to store hazardous waste over 90 days, approximately one year ago. This facility was inspected for compliance with regulations as they apply to a facility with interim status to store hazardous waste.

NOTE: 40 CFR references are Federal hazardous waste rules as promulgated by EPA from May 19, 1980 through June 30, 1983 (Parts 260 - 265) and as adopted by the State of Iowa (900--I.A.C. 45) on September 20, 1983.

SUSPENSE DATE	Signature	Date
<u>1/1</u>	Inspector <u>David N. Whiting</u>	<u>7/17/84</u>
	Regional Administrator <u>Merritt W. Van Lier</u>	<u>7/31/84</u>
Enclosures (Specify)		
Distribution: Regional Office: Central Office: Inspected Facility		

HAZARDOUS WASTE MANAGEMENT FACILITY  
General Administrative Requirements  
Site Inspection Report ChecklistInstruction  
Answer and Explain  
as Necessary

## 1. Waste Analysis [40 CFR 265.13 as Incorporated in 400--45 (455B) I.A.C.]

## a. Waste Analysis Plan

☒ ☒ Adequate☐ ☐ More Effort Required

## &amp; b. Waste Analysis Results (operating record)

☐ ☐ Inadequate

265.73(b)(3)

## 2. Security (264.14) [if applicable]

## a. Access Control

☒ ☒ Adequate☐ ☐ More Effort Required

## &amp; b. Warning Signs

☐ ☐ Inadequate☐ ☐ Not Applicable

## 3. Inspection (265.15)

## a. Inspection Schedule

☒ ☐ Adequate☐ ☐ More Effort Required

## &amp; b. Inspection Log (operating record)

☐ ☒ Inadequate

265.73(b)(5)

## 4. Personnel Training (265.16)

## a. Position Descriptions

☒ ☐ Adequate☐ ☐ More Effort Required

## &amp; b. Training Records

☐ ☒ Inadequate

## 5. Preparedness and Prevention Procedures (265.30 &amp; 265.31)

## a. Required Equipment (265.32)

☒ ☒ Adequate☐ ☐ More Effort Required

## &amp; b. Testing and Maintenance of Equipment (265.33)

☐ ☐ Inadequate☐ ☐ Not Applicable

## c. Access to Communications or Alarm Systems (265.34) &amp; d. Required Aisle Space (265.35)

☒ ☒ Adequate☐ ☐ More Effort Required☐ ☐ Inadequate☐ ☐ Not Applicable

## e. Arrangements with Local Authorities (265.37)

☒ Adequate☐ More Effort Required☐ Inadequate☐ Not Applicable

## 6. Emergency Procedures (265.56)

## a. Contingency Plan (265.52)

☒ ☒ Adequate☐ ☐ More Effort Required

## &amp; b. Instruction on Contingency Plan (training records)

☐ ☐ Inadequate

265.16(a)(2)

## c. Summary and Details of Implementation of Contingency Plan

☐ Adequate☐ More Effort Required☐ Inadequate☐ Not Applicable

## 7. Waste Accountability

## a. Manifests - HW Received &amp; Shipped (265.71 &amp; 262.23)

☒ Adequate☐ More Effort Required☐ Inadequate☐ Not Applicable

## b. Description &amp; Location of HW within Facility (operating record) (265.73)

☒ Adequate☐ More Effort Required☐ Inadequate☐ Not Applicable

## 8. Closure

## a. Closure Plan (265.112)

☒ Adequate☐ ☒ More Effort Required

## &amp; b. Closure Cost Estimate (265.142)

☐ ☐ Inadequate

Update needed

90 days

## c. Financial Assurance for Facility Closure (265.143 - by 4/13/82)

☐ Adequate☐ More Effort Required☐ Inadequate

after August 1, 1984

## 9. Post-Closure (Disposal Facility)

## a. Post-Closure Plan (265.118)

☐ Adequate☐ More Effort Required

## &amp; b. Post-Closure Cost Estimate (265.144)

☐ ☐ Inadequate

## /A c. Financial Assurance for Post-Closure Monitoring &amp; Maintenance (265.145 - by 4/13/82)

☐ Adequate☐ More Effort Required☐ Inadequate

## 0. Liability Insurance (265.147 - by 4/13/82)

☐ Adequate☐ More Effort Required☐ Inadequate

Company Name CLIFTON PRECISIONDate of Inspection 7/11/84Page 3 of 5  
IAD 

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STORAGE FACILITIES SITE INSPECTION REPORT CHECKLIST  
11 (Containers)Instruction  
Answer and Explain  
as Necessary

## a. Condition of Container (265.171)

☒ ☒ Adequate☐ ☐ More Effort Required

## &amp; b. Management of Containers (265.173)

☐ ☐ Inadequate

## c. Inspections (265.174)

☐ Adequate☐ More Effort Required☒ Inadequate

## d. Special Requirements for Ignitable Waste (265.176) &amp; e. Special Requirements for Incompatible Waste (265.177)

☒ ☒ Adequate☐ ☐ More Effort Required☐ ☐ Inadequate☐ ☐ Not Applicable

## f. Security

☒ ☒ Adequate☐ ☐ More Effort Required

## &amp; g. Required Emergency Response Equipment

☐ ☐ Inadequate☐ ☐ Not Applicable

## h. Containment (264.175)

☐ Adequate☐ More Effort Required☐ Inadequate

## i. Estimated Type and Number of Containers

The 39 - 55 gal. barrels of hazardous waste in storage matched the inventory on the operating record. A copy of the current inventory is attached.

## j. Labeling/Marking on Containers (262.31, 32, 34)

☒ Adequate☐ More Effort Required☐ InadequateSTORAGE AND/OR TREATMENT FACILITIES SITE INSPECTION REPORT CHECKLIST  
12 (Tanks)Instruction  
Answer and Explain  
as Necessary

## a. Condition of Tanks (265.192)

☐ Adequate☐ More Effort Required☐ Inadequate

## b. Uncovered Tank Requirements (265.192)

☐ ☐ Adequate☐ ☐ More Effort Required

## &amp; c. Tank with Continuous Feed Requirement (265.192)

☐ ☐ Inadequate☐ ☐ Not Applicable

## d. Inspection (265.194)

☐ Adequate☐ More Effort Required☐ Inadequate

## e. Special Requirement for Ignitable or Reactive Wastes (265.198)

☐ Adequate☐ More Effort Required☐ Inadequate☐ Not Applicable

## f. Security

☐ ☐ Adequate☐ ☐ More Effort Required

## &amp; g. Required Equipment

☐ ☐ Inadequate☐ ☐ Not Applicable

Clifton Precision

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ITEM CODE1.a. Waste Analysis, Waste Analysis Plan

Mr. Bohnsack indicated this facility has determined it is time to do a complete review of waste streams and analyze all existing waste streams. He indicated this would be done in the near future.

3.a. Inspection Schedule and Inspection Log

This facility has developed an inspection schedule and forms for inspection of emergency and safety equipment, including spill cleanup and fire fighting equipment. To this date, the forms documenting inspections have not been used. The forms and inspection schedule are part of the Part B application submitted approximately one year ago by this facility. The inspection of this equipment is required by 40 CFR 265.15. This facility must comply with these requirements by July 31, 1984.

4.b. Personnel Training, Training Records

The personnel training records indicated the last documented update of hazardous waste training, for those identified as needing hazardous waste training, was in December of 1982. An annual update of hazardous waste training is required by 40 CFR Sec. 265.16. This must be complied with by August 31, 1984. Submit documentation of this training to this office when in compliance.

7.a. Waste Accountability, Manifests

The manifests were reviewed and found to be complete and in compliance.

7.b. Waste Accountability, Description & Location of HW within Facility

The operating record kept by this facility was reviewed and found to be complete and in compliance. The list used as the operating record has the following information: the container number, location, accumulation start date, EPA waste number, description of contents, sample number and date, analysis number, manifest number, and shipment date.

The operating record also identified those containers from which samples would be collected. Tests will be performed on the samples collected, as part of the general reanalysis of the waste streams at this facility.

8.b. Closure, Closure Cost Estimate

The closure cost estimate is in need of an annual update. 40 CFR Sec. 265.142 requires the annual update of closure cost estimate. Submit the closure cost estimate to this office by August 31, 1984.

8.c. Closure, Financial Assurance for Facility Closure

The fiscal year for this facility begins on August 1, 1984. Within ninety (90) days of that date an updated financial assurance for facility closure must be developed as required by 40 CFR Sec. 265.143.



Clifton Precision

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ITEM CODE11.c. Storage Facilities, Inspections

The storage area inspection forms were developed approximately one year ago as part of the original Part B application. To this date the storage area inspection forms have not been used as documentation of container storage area inspection. This facility must document a minimum of weekly inspection of hazardous waste container storage area. These inspections are required by 40 CFR Sec. 265.174. This must be complied with by July 31, 1984.

The inspection of the containers revealed that additional head space is needed in some solvent containers. It is recommended a minimum of 3" of head space be allowed in containers of hazardous waste solvent and waste oil.

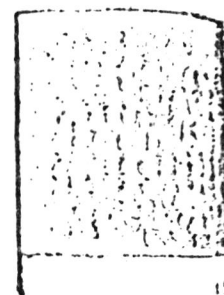
SUMMARY OF RECOMMENDATIONS

- 1) Document weekly inspections of the hazardous waste storage area beginning no later than July 31, 1984.
- 2) Document inspection of safety and clean up equipment, as required by 40 CFR Sec. 265.15, beginning no later than July 31, 1984.
- 3) Submit an updated closure cost estimate to this office by August 31, 1984.
- 4) Submit documentation of an annual update of hazardous waste training to this office by August 31, 1984.

barrels on this list  
 need analysis prior to shipment

current as of March 9 '84

#	EPA	CONTENT	#	EPA	CONTENT
19	FOO7	WASTE ACID	110	FO10?	HEAVY OIL-SLUDGE
28	FOO7	" "			
29	FOO7	" "			
30	FOO7	" "	139	DOOS	SANDO-FIX SEAL
32	FOO7	" "			
33	FOO7	" "	170	DOO2	IRIDITE 14-2
34	FOO7	" "	171	DOO2	IRIDITE 14-2
35	FOO7	" "	172	DOO2	IRIDITE 14-2
87	FOO7	" "	173	DOO2	IRIDITE 14-2
88	FOO7	" "			
117	FOO7	TRICHLOROACETIC	150	FOO1	W/S CHLORINATED
118	FOO7	PHOSPHORIC	151	FOO1	"
169	FOO7	PHOSPHORIC	155	FOO1	"
149	FOO5	WASTE SOLVENTS	156	FOO1	"
152	FOO5	"	159	FOO1	"
153	FOO5	"	161	FOO1	"
154	FOO5	"	162	FOO1	"
157	FOO5	"	164	FOO1	"
158	FOO5	"	166	FOO1	"
160	FOO5	"	167	FOO1	"
163	FOO5	"	174	FOO1	"
165	FOO5	"	176	FOO1	"
168	FOO5	"	177	FOO1	"
175	FOO5	"			



as of  
 June 18, 84

barrel #

178  
 79  
 80  
 81  
 82  
~~183~~  
 4  
 5  
 6  
~~187~~  
~~188~~  
 189



number of times indicates  
 sampled, tested & shipped